

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF IOWA

IN RE:

GRETTER AUTOLAND, INC.,

Debtor.

CASE NO. 14-02831-als7

ADVERSARY NO. 16-30001-als7

Robert G. SCHLEGEL, in his capacity as
Chapter 7 Trustee and not individually,

Plaintiff,

v.

BROWN, WINICK, GRAVES, GROSS,
BASKERVILLE & SCHOENEBAUM, PLC,
and
EDWARDS AUTO PLAZA, INC.,

Defendants.

ANSWER OF BROWN, WINICK, GRAVES,
GROSS, BASKERVILLE &
SCHOENEBAUM, P.L.C.

COMES NOW the Defendant, Brown, Winick, Graves, Gross, Baskerville & Schoenebaum, P.L.C, and for its answer to the Plaintiff's Complaint for Declaratory Relief (the "Complaint"), states as follows:

1. Paragraph 1 of the Complaint is a preliminary statement to which no response is required.
2. This Defendant admits the allegations contained in paragraph 2 of the Complaint.
3. This Defendant admits the allegations contained in paragraph 3 of the Complaint.
4. This Defendant admits the allegations contained in paragraph 4 of the Complaint.
5. This Defendant admits the allegations contained in paragraph 5 of the Complaint.

6. This Defendant admits the allegations contained in paragraph 6 of the Complaint.
7. This Defendant admits the allegations contained in paragraph 7 of the Complaint.
8. This Defendant admits the allegations contained in paragraph 8 of the Complaint.
9. This Defendant admits the allegations contained in paragraph 9 of the Complaint.
10. This Defendant admits the allegations contained in paragraph 10 of the Complaint.
11. This Defendant admits that on August 27, 2015, Edwards notified Brown Winick in writing that Edwards was terminating the APA due to purported defaults by Gretter Autoland, Inc., but denies the remaining allegations contained in paragraph 11 of the Complaint. This Defendant affirmatively states further that it had conversations with counsel for Edwards responsive to Edwards purported default allegations and responsive to Edwards request for return of the Deposit.
12. This Defendant admits the allegations contained in paragraph 12 of the Complaint.
13. This Defendant admits the allegations contained in paragraph 13 of the Complaint.
14. This Defendant admits the allegations contained in paragraph 14 of the Complaint.
15. This Defendant admits the allegations contained in paragraph 15 of the Complaint.
16. This Defendant admits the allegations contained in paragraph 16 of the Complaint.
17. This Defendant admits the allegations contained in paragraph 17 of the Complaint.
18. This Defendant admits the allegations contained in paragraph 18 of the Complaint.
19. This Defendant admits the allegations contained in paragraph 19 of the Complaint.
20. This Defendant admits the allegations contained in paragraph 20 of the Complaint.
21. This Defendant admits the allegations contained in paragraph 21 of the Complaint.
22. This Defendant incorporates by reference and restates its answers to paragraphs 1-19 of the Complaint as if fully set forth here in full.

23. This Defendant admits the allegations contained in paragraph 23 of the Complaint.

WHEREFORE, the Defendant, Brown, Winick, Graves, Gross, Baskerville & Schoenebaum, P.L.C., respectfully requests judgment as set forth in paragraph 23 of the Complaint, and for such other and further relief as the Court may deem just and proper.

/s/ Sean P. Moore

Sean P. Moore, IS9998315

BROWN, WINICK, GRAVES, GROSS,
BASKERVILLE AND SCHOENEBAUM, P.L.C.
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ATTORNEY FOR DEFENDANT,
BROWN, WINICK, GRAVES, GROSS,
BASKERVILLE AND SCHOENEBAUM, P.L.C

CERTIFICATE OF SERVICE

On February 2, 2016, this document was served electronically on parties who receive electronic notice through CM/ECF as listed on CM/ECF's notice of electronic filing.

/s/ Sean P. Moore